

### **REMARKS**

The non-final Office Action of July 7, 2009 has been reviewed and these remarks are responsive thereto. Claims 1, 7, 8-10, 12-14 and 17 have been amended. No new matter has been added. Claims 5 and 6 have been cancelled without prejudice of disclaimer. Claims 1, 4 and 7-17 are pending upon entry of the present amendment. Reconsideration and allowance of the instant application are respectfully requested.

### **Statement of Common Ownership**

As noted previously, the present application and Heie (U.S. Patent No. 6,473,621, "Heie") were, at the time the invention was made, both owned by, or subject to an obligation of assignment to Nokia Corporation or wholly owned subsidiary thereof.

### **Claim Rejections**

Claim 15 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over King *et al.* (U.S. Patent No. 5,953,541, "King") in view of Walker (U.S. Patent No. 6,528,741 B2, "Walker"), Tsuji *et al.* (U.S. Patent No. 5,581,599, "Tsuji"), Guo (U.S. Patent Pub. No. 2002/0135499, "Guo") and Heie. Applicant respectfully traverses. Applicant again notes that, based on the above Statement of Common Ownership, Heie is not applicable prior art for a rejection under 35 U.S.C. §103(a). Accordingly, claim 15 is allowable for at least this reason.

Claims 1, 4-14 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over King in view of Walker, Tsuji and Guo. Applicant respectfully traverses.

Amended independent claims 1, 7 and 14 relate to, *inter alia*, receiving a user keystroke corresponding to a pressing of a first key of a plurality of alphanumeric keys, the pressing of the first key configured to cause selection of a character group comprising a plurality of different characters and receiving user input corresponding to a selection of a second key of the plurality of alphanumeric keys after the pressing of the first key, wherein the selection of the second key without selection of other keys causes scrolling through the plurality of different characters included in said selected character group. Illustrative, non-limiting support for the amendments may be found throughout the original filed Specification and specifically at, for example, p. 7, ll. 23-31 and p. 10, ll. 18-19. None of the cited references teaches or suggests such features.

The Office Action asserts that Walker describes, in the Abstract, col. 1 lines 55-67 and Figure 1, a first key (a multi-way shift key) “used in conjunction with” second keys (a plurality of single-contact keys) to “scroll through characters step by step.” Office Action, p. 3. Even assuming, without conceding, that the selection of characters by engaging a combination of one of four switch contacts of key 3 and a single switch contact of keys 2 describes scrolling (Col. 2, ll. 11-20), nowhere does Walker or any of the other cited references teach or suggest scrolling through a plurality of different characters in a character group caused by selection of a key without selection of other keys. In contrast and as conceded by the Office Action, Walker allegedly describes scrolling by using a **combination** of keys. Claims 1, 7 and 14 are thus allowable for at least these reasons.

Additionally, the Office Action admits that the combination of Walker and King fails to clearly state that the dedicated key is a scrolling key, but that Tsuji discloses this feature at col. 10 lines 33-45. However, the Office has now repeatedly ignored the deficiencies of Tsuji that render the combination of references insufficient to teach or suggest each and every feature of claims 1, 5, 7 and 14. Notably, Tsuji lacks a teaching or suggestion of a key **becoming** a dedicated scroll key *when in an editor mode*. That is, even assuming, without conceding, that any of Walker, King, Tsuji or Guo teaches or suggests an editor mode, the references still lack a teaching or suggestion of a *change* in functionality of a key to a scrolling function when in the editor mode. Accordingly, claims 1, 7 and 14 are allowable for this additional reason.

Claims 4, 8-13, 16 and 17 each depend from one of claims 1, 7, and 14 and are thus allowable for at least the same reasons as their base independent claim and in further view of the features recited therein. For example, regarding claim 17, the Office Action asserts that the combination of King, Walker, Tsuji and Guo teaches or suggests wherein the second key corresponds to a non-scrolling function when not in the editor mode. No support for this assertion is provided. In fact, the Office Action offers no explanation or citations from any of the references in rejecting this claim. Accordingly, Applicants respectfully submit that the Office has not established a *prima facie* case of obviousness. Claim 17 is thus allowable for this additional reason.

**CONCLUSION**

Based on the foregoing, Applicant respectfully submits that the application is in condition for allowance and a Notice to that effect is earnestly solicited. Should the Examiner believe that anything further is desirable in order to place the application in even better form for allowance, the Examiner is respectfully urged to contact Applicant's undersigned representative at the below-listed number.

Respectfully submitted,

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